

September 16, 2013

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554.

Re: WC Docket No.13-184 - Modernizing the E-Rate Program

Dear Secretary Dortch:

New Classrooms is pleased to provide comments to the FCC on its recently issued Notice of Proposed Rulemaking to modernize the E-rate program. As explained below, New Classrooms strongly encourages the FCC to include mobile broadband Internet access both on and off of school grounds and to provide funding for smartphones and tablets because these mobile learning tools are critically important to the successful learner of today.

New Classrooms was born out of the belief that today's model for delivering education—one teacher and a few dozen students in a classroom—does not sufficiently account for each student's needs and assumes that each student arrives on the first day of school with the same academic foundation and way of learning. For a teacher, this presents the nearly impossible challenge of teaching grade-level curriculum while also meeting the needs of each student. Mobile technology places a personalized learning device into the hands of each student and offers a means of meeting each student's needs. If a student finishes work early and wants to explore a related issue, they can do so at the tap of a finger. If another student requires more time in order to fully grasp a new concept, they can pull up additional examples, ask a virtual classmate, or watch a lecture.

Moreover, smartphones and tablets, when used in conjunction with mobile broadband access, allow students to learn on a 24/7 basis, dramatically improving educational achievement and enabling new ways of teaching and learning. Also, e-readers cost less than paper textbooks, can hold many more books and reference sources, support customized curricula, and can provide a dynamic reading experience that blends written content with audio/video content. E-rate should fund these devices and associated mobile connectivity. Without federal support, low-income students will not be able to keep pace with students that can afford devices and 24/7 wireless access and a "mobile divide" will emerge.

Home access to broadband is critically important to the student of today. By the time a student turns 18, only 13% of the student's waking life will have been spent in a classroom. Enabling learning outside of the classroom is crucial to improving education and ensuring America's students are not at a competitive disadvantage in the global marketplace. Bringing mobile



broadband technology into the home where parents can interact with some of the same technologies that their children might use at school will help facilitate their involvement and support for their children's learning process. As FCC Commissioner Rosenworcel noted in supporting the NPRM, "Access to adequate broadband is not a luxury, it is a necessity for our next generation to be able to compete."

The Commission's NPRM explicitly recognizes "the potential value to students ... of having access to broadband access off premises ... ." The FCC should support that recognition by authorizing E-Rate funding for such access and the mobile devices needed to take advantage of the added educational capability it can provide. Accordingly, the FCC should reform the E-rate program so that it includes funding for mobile broadband Internet access and devices so that underprivileged students will have the type of anywhere/anytime access that more privileged students and their families take for granted.

Sincerely,

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Chief Executive Officer

New Classrooms